



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 14, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)*

Dear Judge Nathan:

The Government respectfully submits this letter in response to the Court's Order dated May 13, 2021, which directed the Government to propose and justify any requests for redaction of the defendant's response to the Government's letters of May 4 and May 6, 2021 and the attached exhibits. (Dkt. No. 279).

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After reviewing the defense's letter and exhibits, the Government respectfully submits that Exhibits A and B should be filed under seal. This proposal is consistent with the three-part test articulated by the Second Circuit in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Although the defense's letter and exhibits are judicial documents subject to the common law presumption of access, sealing the exhibits—each of which is only one page—is narrowly tailored to protect the privacy interests of a victim and third party implicated in the documents. The Court has accepted other exhibits under seal or in redacted form in this case to protect such privacy interests. (*See, e.g.*, Dkt. No. 168, 232).

Respectfully submitted,

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Cc: Defense counsel (By ECF)